

FAEGRE DRINKER BIDDLE & REATH LLP

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RESERVOIR MEDIA MUSIC, ALMO MUSIC
CORPORATION, UNIVERSAL POLYGRAM
INTERNATIONAL PUBLISHING, INC., and AY
VAUGHAN MUSIC, INC.,

Plaintiffs,

v.

CAPE MANAGEMENT COMPANY LLC,
CURTIS BASHAW, and CRAIG D. WOOD.,

Defendants.

CIVIL ACTION NO.
1:25-cv-01582-KMW-EAP

**APPLICATION FOR CLERK'S
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE REPLY
PURSUANT TO LOCAL CIVIL
RULE 6.1(b)**

Application is hereby made to the Clerk of the United States District Court for the District of New Jersey by Faegre Drinker Biddle & Reath, LLP, attorneys for Defendants Cape Management Company LLC, Curtis Bashaw, and Craig D. Wood ("Defendants"), for an extension of time within which to answer or otherwise reply to the Complaint, herein for a period of fourteen (14) days pursuant to Local Civil Rule 6.1(b). Defendants represent that:

1. No previous extension has been obtained;
2. Defendant Cape Management Company LLC was served on March 17, 2025;
3. Absent this extension, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Defendants' time to answer or otherwise respond to the Complaint would expire on April 7, 2025; and
4. With this extension, Defendants' Answer or other response would be due on April 21, 2025.

Dated: April 4, 2025

/s/William A. Wright

William A. Wright

The above application be and hereby is GRANTED and the time to answer or otherwise reply is extended for a period of fourteen (14) days up to and including April 21, 2025, pursuant to Local Civil Rule 6.1(b) of the United States District Court for the District of New Jersey.

MELISSA E. RHOADES,
Clerk of the United States District Court
District of New Jersey

By: _____
Deputy Clerk

Dated: _____, 2025